



Infrastructure · Water · Environment · Buildings

Mr. Keith Krawczyk
MDEQ-RRD-Superfund
Constitution Hall – 5th Floor South
P.O. Box 30426
525 West Allegan Street
Lansing, Michigan 48909-7926

US EPA RECORDS CENTER REGION 5



ARCADIS
6723 Towpath Road
P.O. Box 66
Syracuse
New York 13214-0066
Tel 315.446.9120
Fax 315.671.9450
www.arcadis-us.com

ENVIRONMENT

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3 Progress Report (June 2013)

Dear Mr. Krawczyk:

On behalf of Georgia-Pacific LLC (Georgia-Pacific), attached is the June 2013 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent (AOC) for the Remedial Design/ Remedial Action at the KHL OU, as was fully executed on February 8, 2000. Please note, however, pursuant to Section XVI of the AOC, since the Certificate of Completion of Construction was issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, this is the last Monthly Progress Report. Future reports documenting operation, maintenance, and monitoring activities shall be submitted pursuant to the schedule set forth in the Operation and Maintenance Plan.

Date:

July 15, 2013

Contact:

Patrick McGuire

Phone:

315.671.9233

Email:

Pat.McGuire@arcadis-us.com

Our ref:

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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC
Daria Devantier, Michigan Department of Environmental Quality
Michael Berkoff, USEPA Region 5
Dawn Penniman, P.E., ARCADIS

**PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
KING HIGHWAY LANDFILL OPERABLE UNIT 3**

JUNE 2013

PREPARED JULY 15, 2013

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**KEITH KRAWCZYK, PROJECT COORDINATOR
REMEDICATION AND REDEVELOPMENT DIVISION**

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
June 2013 Monthly Progress Report**

Remedial Activities

- On June 7, a letter dated May 30, 2013 was received from the Michigan Department of Environmental Quality (MDEQ) requesting reimbursement for oversight cost associated with the KHL OU pursuant to Section XXI of the AOC.
- On June 10, Georgia-Pacific requested the MDEQ supply invoices from Camp Dresser & McGee in order to evaluate the May 30, 2013 reimbursement request. The letter also included a request to toll the time period for dispute resolution or paying the response cost until the requested invoices are received (MDEQ provided approval of the tolling request via e-mail on July 3).
- On June 13, ARCADIS submitted to the MDEQ and the United States Environmental Protection Agency (USEPA) the May 2013 Monthly Progress Report.
- On June 24, Miller Canfield (attorney for Georgia-Pacific) received the fully executed Declaration of Restrictive Covenants from the Michigan Department of Attorney General's office.
- On June 24, Miller Canfield, on behalf of Georgia-Pacific, recorded the Declaration of Restrictive Covenants with the Kalamazoo County Register of Deeds. Miller Canfield awaits receipt of the final registered documents from the county.
- On June 26, MDEQ provided the Certificate of Completion of Construction for the KHL OU pursuant to paragraph 27.2 of the AOC.
- In accordance with paragraph 16 of the AOC and Section 10 of the May 2013 *FINAL Operation and Maintenance Plan* (O&M Plan), monthly progress reports are no longer required with MDEQ's issuance of the Certificate of Completion of Construction. Instead, reports of environmental monitoring and operation and maintenance of the KHL OU will be submitted as identified in Section 10 of the O&M Plan. As described in Section 10, a report will be submitted to MDEQ following each landfill gas monitoring event, groundwater sampling event, and landfill inspection, as well as documentation of any landfill maintenance completed.

Operation, Maintenance, and Monitoring Activities

- On June 7, John & Henry Engineers, Ltd. provided Georgia-Pacific details of the gas monitoring performed during the Riverview directional drilling to install the force main, which indicated that air monitoring of the excavation did not result in any exceedances of any gas levels that would render the air unsafe for persons inside the excavation.
- On June 13, Georgia-Pacific submitted to the Kalamazoo Metal Recyclers, Inc. (KMR) a letter providing notification of the recent detections of methane gas along the western property boundary of the KHL, which adjoins their property.

**Georgia-Pacific LLC
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- On June 20, ARCADIS submitted to the MDEQ the 2013 2nd quarter landfill gas monitoring report. The report included the results of the monitoring performed at the five new landfill gas probes installed along the western property line during the week of May 20 consistent with the Investigation Plan for Off-Site Landfill Gas Migration at the KHL dated March 13, 2013. The report discussed the methane gas detections at concentrations above the lower explosive limit in new gas probes GW-18 and GW-19. The report also described a number of lines of evidence that support a conclusion that the landfill gas does not present a significant risk to the adjacent property, KMR, or to the buried public utilities that exist along the western property line.
- On June 25, MDEQ provided their new office location and phone number via email, as well as request that sample ports be installed on new gas probes GW-19 and GW-20 and that the excavated material/cuttings generated during the recent gas probe installation activities be removed from the KHL.
- On June 25, ARCADIS submitted to the MDEQ the 2013 1st semi-annual landfill inspection report.
- On June 25, MDEQ provided comments on the 2013 2nd quarter landfill gas monitoring report via email, which requested that the report be revised to include the following information: a description of the fill material above and around the 72-inch diameter sanitary sewer line; the location, depth, and elevation of the sanitary sewer; the groundwater elevation in relation to the sanitary sewer; and the hydro excavation that was performed at the KHL.

Upcoming Activities

- In July, ARCADIS will revise the 2013 2nd quarter landfill gas monitoring report to include the requested information as well as additional discussion to support the conclusion reached by Georgia-Pacific and MDEQ that the methane detections along the western property boundary of the KHL do not pose a risk.
- In the third quarter of 2013, and 10 days following receipt from Kalamazoo County Register of Deeds of the recorded Restrictive Covenants, Georgia-Pacific will provide the MDEQ with a true copy of the recorded Restrictive Covenants.
- In the third quarter of 2013, Georgia-Pacific anticipates installation of the permanent markers at the KHL. Please note that the delivery of the permanent markers is anticipated to be 6 to 8 weeks following order. The permanent markers are expected to be ordered the week of July 15.
- In the third quarter of 2013, and 30 days following provision of a true copy of the recorded Restrictive Covenants to MDEQ, Georgia-Pacific will provide the MDEQ with documentation that all required institutional controls and operation and maintenance plans are in place and being implemented. Please note that due to the extended delivery date of the permanent markers, not all of the institutional controls (i.e. permanent marker) may be in place at the time the documentation is required to be submitted pursuant to the AOC.